

Christopher Heimann General Attorney & Assistant General Counsel

AT&T Services, Inc. 1120 20th Street NW, Suite 1000 Washington, D.C. 20036 Phone 202 457-3058 Fax 202 457-3074

July 28, 2016

Ms. Marlene Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington DC 20554

Re: Cable Special Relief Petitions; MB Docket No. 12-1

Dear Ms. Dortch:

Consistent with the Market Modification docket referenced above, attached are results for a preliminary evaluation of a potential market modification for stations KUSA, KTVD, KCNC, KDVR, KWGN, KMGH, KZCO and KRMA in La Plata County, CO.

If you have any questions, feel free to contact me at (202) 457-3058.

Sincerely,

/s/ Christopher M. Heimann



July 22, 2016

Via E-mail and FedEx

La Plata County Board of County Commissioners La Plata County 1101 E. 2nd Ave. Durango, CO 81301 joanne.spina@co.laplata.co.us

Dear La Plata County Board of County Commissioners:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for stations KUSA, KTVD, KCNC, KDVR, KWGN, KMGH, KZCO, and KRMA in La Plata County, CO.

DIRECTV's engineering staff was given the areas to evaluate for our Denver, CO spot beams, and have found that:

• DIRECTV's HD spot beam does not cover **7** zip codes in La Plata County

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

1. My name is Phil Goswitz I am	SVP of Engineering	at DIRECTV. As
such, I am responsible for determining service area	as for television stations carried on	DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

- COC.		
KCNC	СО	LA PLATA

- 3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
 - b. Estimated atmospheric effects for reception of the signal.
 - c. Estimated levels of interference.
 - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - e. The target availability figure used for all television stations offered on the spot beam.
- 4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
 - a. Signal availability.
 - b. Clear sky signal margin.
 - c. Total carrier-to-interference ratio.
- 5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
- 6. Based on this analysis, DIRECTV:

☐ HD ☑SD Can provide service to all the zip codes associated with this request.*

 \square HD \square SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.

☑HD ☐SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.

* IMPORTANT: SD coverage will no longer be available after 2018/2019 when the existing MPEG 2 satellite is removed from service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

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1. My name is _	Phil Goswitz	lam	SVP of Engineering	at DIRECTV. As
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C1	C+-+-	County
KDVR	СО	LA PLATA

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-16

Signature

1. My name is _	Phil Goswitz	. lam_	SVP of Engineering	_ at DIRECTV. As
such, I am respo	onsible for determining servic	e areas	for television stations carried on DIRECT\	/'s spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
KMGH	СО	LA PLATA

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 - a. The measured performance of the spot beam covering this Television Station's local market.
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I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4-19-16
Date
Signature

1. My name is <u>F</u>			SVP of Engine		at DIRECTV. As
such, I am respons	ible for determin	ing service areas f	or television sta	tions carried on	DIRECTV's spot beams.
2. DIRECTV has re station indicated.	viewed the reque	st to add the com	munities listed l	pelow to the loc	al television market for the
Station	State	County			
KRMA	CO	LA PLATA	250, 254 SAMMER 31, \$250.		90-20 m, 40-50
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5. DIRECTV has con parameters used to	nducted this analy determine the g	/sis in substantiall eographic area in	y the same man which it current	ner and using suly ly offers station	ubstantially the same is carried on the spot beam.
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* IMPORTANT: S removed from	D coverage will n service.	o longer be availa	ble after 2018/2	019 when the e	existing MPEG 2 satellite is
I declare under pen	alty of perjury tha	at the foregoing is	true and correc	t.	
Executed on 7-	19-16	0			

Signature

Date

1. My name such, I am re					ngineering on stations		at DIRECTV. As RECTV's spot beams.	
2. DIRECTV station indic		the request to a	dd the com	ımuniti e s l	isted below	to the local t	television market for the	9
St	ation	State (County					
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5. DIRECTV l	has conducte used to deter	d this analysis in s mine the geograp	substantial phic area in	ly the same which it c	e manner a urrently off	nd using subs ers stations c	stantially the same carried on the spot bean	n.
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* IMPORTA	ANT: SD cove d from service	rage will no longe e.	er be availa	ible after 2	2018/2019 v	when the exis	sting MPEG 2 satellite is	
I declare und	ler penalty of	perjury that the	foregoing is	s true and	correct.			
Executed on .	7-19- Dat	16 e						

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such, I am respo	nsible for determining se	rvice areas	for television stations carried on D	DIRECTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	: 1985년 - 1985년	
KUSA	СО	LA PLATA	

- 3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
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Signature

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Station State County
KWGN CO LA PLATA
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6. Based on this analysis, DIRECTV: HD SD Can provide service to all the zip codes associated with this request.* HD SD Cannot provide service to any zip code associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service. HD SD Cannot provide service to some zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.* The list of unserved zip codes is attached.
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I declare under penalty of perjury that the foregoing is true and correct.
Executed on 7-19-16 Date

1. My name is _	Phil Goswitz	. I am _	SVP of Engineering	at DIRECTV. As
such, I am respo	onsible for determining servi	ce areas	for television stations carried on DIRE	CTV's spot beams.

2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station		County
KZCO-LP	СО	LA PLATA

- 3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
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Executed on

7 7 19

Signature

						HD Evaluation
Station	Zip	USPSFIPS	State	County	HD Covered	Completed
KCNC	81137	08067	со	LA PLATA	No	7/13/2016
KCNC	81301	08067	СО	LA PLATA	No	7/13/2016
KCNC	81302	08067	СО	LA PLATA	No	7/13/2016
KCNC	81303	08067	СО	LA PLATA	No	7/13/2016
KCNC	81326	08067	СО	LA PLATA	No	7/13/2016
KCNC	81328	08067	СО	LA PLATA	No	7/13/2016
KCNC	81329	08067	СО	LA PLATA	No	7/13/2016
KDVR	81137	08067	СО	LA PLATA	No	7/13/2016
KDVR	81301	08067	СО	LA PLATA	No	7/13/2016
KDVR	81302	08067	СО	LA PLATA	No	7/13/2016
KDVR	81303	08067	СО	LA PLATA	No	7/13/2016
KDVR	81326	08067	СО	LA PLATA	No	7/13/2016
KDVR	81328	08067	СО	LA PLATA	No	7/13/2016
KDVR	81329	08067	СО	LA PLATA	No	7/13/2016
KMGH	81137	08067	СО	LA PLATA	No	7/13/2016
KMGH	81301	08067	СО	LA PLATA	No	7/13/2016
KMGH	81302	08067	СО	LA PLATA	No	7/13/2016
KMGH	81303	08067	СО	LA PLATA	No	7/13/2016
KMGH	81326	08067	СО	LA PLATA	No	7/13/2016
KMGH	81328	08067	CO	LA PLATA	No	7/13/2016
KMGH	81329	08067	CO	LA PLATA	No	7/13/2016
KRMA	81137	08067	CO	LA PLATA	No	7/13/2016
KRMA	81301	08067	CO	LA PLATA	No	7/13/2016
KRMA	81302	08067	СО	LA PLATA	No	7/13/2016
KRMA	81303	08067	CO	LA PLATA	No	7/13/2016
KRMA	81326	08067	CO	LA PLATA	No	7/13/2016
KRMA	81328	08067	CO	LA PLATA	No	7/13/2016
KRMA	81329	08067	CO	LA PLATA	No	7/13/2016
KTVD	81137	08067	CO	LA PLATA	No	7/13/2016
KTVD	81301	08067	CO	LA PLATA	No	7/13/2016
KTVD	81302	08067	CO	LA PLATA	No	7/13/2016
KTVD	81303	08067	CO	LA PLATA	No	7/13/2016
KTVD	81326	08067	CO	LA PLATA	No	7/13/2016
KTVD KTVD	81328	08067	CO	LA PLATA	No	7/13/2016
	81329	08067	CO	LA PLATA	No No	7/13/2016
KUSA	81137	08067	CO	LA PLATA	No	7/13/2016
KUSA	81301	08067	CO	LA PLATA	No	7/13/2016
KUSA	81302	08067	CO	LA PLATA	No	7/13/2016
KUSA	81303	08067 08067	СО	LA PLATA	No	7/13/2016
KUSA KUSA	81326 81328	08067	CO	LA PLATA LA PLATA	No No	7/13/2016 7/13/2016
KUSA	81329	08067	co	LA PLATA	No	7/13/2016
KWGN	81137	08067 08067	CO	LA PLATA	No No	7/13/2016
KWGN	81301		CO	LA PLATA	No No	7/13/2016
KWGN KWGN	81302 81303	08067 08067	CO	LA PLATA LA PLATA	No No	7/13/2016 7/13/2016
KWGN	81326	08067	СО	LA PLATA	No	7/13/2016
KWGN	81328	08067	CO	LA PLATA	No	7/13/2016
KWGN	81329	08067	со	LA PLATA	No	7/13/2016
(ZCO	81122	08067	СО	LA PLATA	No HD channel availabl	
KZCO KZCO	81137	08067	CO	LA PLATA	No HD channel available	
KZCO	81301	08067	СО	LA PLATA	No HD channel availabl	
KZCO	81302	08067	CO	LA PLATA	No HD channel availabl	
KZCO KZCO	81303	08067	СО	LA PLATA	No HD channel availabl	
KZCO KZCO	81326	08067	СО	LA PLATA	No HD channel availabl	
KZCO KZCO	81328	08067	со	LA PLATA	No HD channel availabl	
(ZCO	81329	08067	СО	LA PLATA	No HD channel availabl	
(ZCO-LP	81122	08067	СО	LA PLATA	No HD channel availabl	
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